

RE: Calculation Assistance

Wax, Peter N. <pwax@nd.gov>

Thu 12/12/2019 9:52 AM

To: Wirick, Holiday <wirick.holiday@epa.gov>

Dear Holly:

Issue 1) Thanks for sending the spreadsheet. The calculator works perfectly with the one I sent you. North Dakota does not correct for freshwater dissolved so the last step is not used. If you divide by correction factor the numbers match perfectly. Thanks.

Issue 2) As for my Mercury issue, the 0.012 ug/L is for Methylmercury (CAS No. 22967926) and out of the Gold book (1986).

As for Mercury (CAS No. 7439976) the most recent 304(a) guidance uses cmc 1.4 and ccc 0.77.

We use the EPA recommended 0.3 mg/kg methylmercury (not the standards) for our consumption advisory.

I am struggling with why updating to the most recent science on mercury (1995), as published by EPA and required on section 304(a) cannot be appropriate.

Lastly) I will call you shortly after 10 your time. If that doesn't work, I will try this afternoon. Not a big rush on this., Maybe I need to start a battle on both fronts and get Methylmercury in the standards.

Pete

From: Wirick, Holiday <wirick.holiday@epa.gov>

Sent: Wednesday, December 11, 2019 4:21 PM

To: Wax, Peter N. <pwax@nd.gov>

Subject: RE: Calculation Assistance

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Hi Pete, attached is the spreadsheet for calculating 304(a) metals criteria that I mentioned in my voicemail message.

The acute and chronic aquatic life criteria for mercury total recoverable are 1.4 ug/L and 0.77 ug/L, respectively. When you have time, let's talk about your plans for revising the mercury criteria.

Thanks – and have a great evening!

Holly Wirick
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From: Wax, Peter N. <pwax@nd.gov>

Sent: Thursday, December 5, 2019 2:00 PM

To: Wirick, Holiday <wirick.holiday@epa.gov>

Subject: Calculation Assistance

Dear Holly:

Hope all is well and you had a great Thanksgiving. I consumed toooo much but that is as it should be.

On work related topics, I need a favor and have a question.

Favor: Would you please check out these tables to make sure I have the calculations correct for trace elements that are hardness dependent (total and freshwater).

Questions: What is are correct aquatic life criteria (Acute and Chronic) for Mercury total recoverable (dissolved + suspended)?

Pete

Peter N. Wax
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